

# Part 437, Centralized Waste Treatment Standards- New Source Questions



# Question 1

- Solvent recovery facility receives waste from off-site, discharges to POTW. Facility wants to start treating other organic wastes. Treatment system would not be modified.
- Existing or new source?

# Answer 1

- Whether a change/addition results in a new source depends on whether there's installation of process equipment where no other source is located, total replacement of process equipment, or construction of process equipment that's substantially independent from existing source. For CWTs, process=treatment.
- Facility was originally exempt
- Existing source- no construction of process/treatment equipment

## Question 2

- Facility receives and treats waste from off-site, but wastewater is hauled to another CWT. Facility wants to modify treatment system and discharge to POTW. Would need to modify treatment system to meet local limits.
- Existing or new source?

## Answer 2

- This would be a modification of an existing treatment system, which would generally not result in the discharge being a new source.
- Specific facts could result in this being a new source, i.e. if they really didn't have treatment before, or if the modification allows for treatment of a different category of waste.

## Question 3

- Facility receives waste from off-site for storage and transfer only. Wants to add small treatment process for certain types of wastes subject to CWT regs. Treated wastewater would go to POTW.
- Existing or new source?

## Answer 3

- The facility would be installing process/treatment equipment at a site where no other wastewater generating process is located, and would be a new source.

## Question 4

- A CWT handles metal and oily waste, and has treatment appropriate for both. They now propose to handle organic waste.
- Existing or new source?



## Answer 4

- If they need to add treatment to treat organic wastes, that process would be substantially independent from the other treatment processes, and the organics wastestream would be subject to PSNS.

## Question 5

- An oil rerefiner previously hauled its wastewater offsite. It now decides to treat the wastes onsite and discharge to the POTW.
- Existing or new source?

## Answer 5

- The facility would be treating CWT wastewater for the first time, and due to construction of treatment, would be a new source.

## Question 6

- A manufacturing facility has on-site wastewater from a single ELG, and accepts similar waste from off-site. What regulations apply?

## Answer 6

- If the off-site waste is or would be subject to the same limits as the on-site wastewater, or is similar to the onsite wastewater and compatible with the waste treatment system, the CWT standards don't apply to the off-site wastes. The on-site standards would apply.

## Question 7

- A manufacturing facility accepts waste from off-site that's not compatible with the onsite wastes. What regulations apply?

## Answer 7

- The on-site wastewater remains subject to the relevant standards for that facility. The CWT regs would apply to the off-site wastes, except that...
- If the facility receives wastewater on a continuous basis from 5 or fewer generators with consistent profiles, could set alternative limits based on the standards applicable to the waste if discharged on-site by the generator.

## Question 8

- A manufacturing facility has no on-site wastewater, but accepts waste from a single category from off-site. What regulations apply?



## Answer 8

- There's no wastewater from the on-site manufacturing, so presence of the manufacturing isn't relevant. The CWT regs would apply to the off-site wastes, except that...
- If the facility receives wastewater on a continuous basis from 5 or fewer generators with consistent profiles, could set alternative limits based on the standards applicable to the waste if discharged on-site by the generator.